



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY

REGION 6

1445 ROSS AVENUE, SUITE 1200  
DALLAS, TX 75202-2733

December 7, 1998

*John*



Mr. Benito Garcia, Chief  
Hazardous and Radioactive  
Materials Bureau  
New Mexico Environment Department  
2044A Galisteo Street  
Santa Fe, NM 87505

Re: Recommendations and Comments on the Response to the Request for Supplemental Information for the RFI Report for TA-1, Aggregates N and P, LA-UR-98-268, EM/ER-97-3320, Los Alamos National Laboratory (LANL), EPA I.D. NM0890010515

Dear Mr. Garcia:

The Environmental Protection Agency (EPA) has reviewed LANL's Response to the Request for Supplemental Information for the RFI Report for TA-1, Aggregates N and P, dated August 6, 1998, and has found the Response to be acceptable in certain areas, but unacceptable in other areas. EPA recommendations and comments are enclosed for your review.

Should you have any questions, please feel free to contact Mr. Rich Mayer at (214) 665-7442.

Sincerely,

*David W. Neleigh*  
David W. Neleigh, Chief  
New Mexico and Federal  
Facilities Section

Enclosure



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1/1075/1  
LANL

TL

**Comments on LANL's Response to the Supplemental Information (RSI)  
Request for the RFI Report for TA-1, Aggregates N and P**

This RSI includes SWMUs: 1-001(s & u), the Western Sanitary Waste Line (WSWL); 1-006(s), a former storm drain and outfall for Building P; and, 1-007(l), an area of suspected soil contamination located beneath a section of Trinity Drive.

**Recommendations**

In summary, NMED will require LANL to submit a sampling and analysis plan for locations 1A and 13 for the Western Sanitary Waste Line (WSWL). Since 7 of the 13 locations approved in the workplan were not sampled, NMED cannot grant a NFA for 1-001s & u. NMED will require that LANL submit a sampling and analysis plan for 1-001 (s & u) at locations 1A, 13, and the broken pipe sections at 1A. Also, NMED will require (in the sampling and analysis plan) that LANL perform an exhaustive search of subsurface sampling techniques for the locations that were not sampled. LANL must include different sampling techniques in the sampling and analysis plan for the unsampled locations or justify why those locations cannot be sampled by other subsurface sampling methods.

For SWMU 1-006(s), NMED tentatively agrees with LANL's no further action proposal. However, in the Class III permit modification to be submitted to NMED, LANL must provide the appropriate documentation (engineering drawings, employee interviews, etc.) indicating that the SWMU never handled hazardous constituents and therefore did not need to be sampled.

For SWMU 1-007(l), LANL must provide the correct sampling results. The results provided by LANL in the Response to NMED's Supplemental Request do not correlate with the ID locations in the RFI Report. NMED is requiring that LANL provide the correct sampling results for this SWMU. No determination can be made on this SWMU until the correct information is submitted to NMED.

<b>PRS</b>	<b>LANL'S PROPOSED ACTION</b>	<b>DOES AA CONCUR?</b>	<b>AA RATIONALE</b>
1-001(s,u)	NFA	No	See PRS specific comments
1-006(s)	NFA	Yes	See Recommendation comments

**1-007(I)      NFA                  No                          See PRS specific comments**

**General Comments**

- 1.      Response to General Comment No. 1:** LANL did not submit the entire sampling results on 1-001(I) or the information submitted is misnumbered. The location ID numbers for this site are 01-4190 thru 01-4192 and 01-10131 thru 01-10133. LANL included location ID numbers 01-4290 thru 01-4292 in the submittal. Please clarify whether these results are associated with 1-001(I), and if they are not associated with this SWMU, please provide the correct results. Until the correct sampling results are submitted, no determination can be made for this SWMU.

Also, the organic results for locations 01-10110 thru 01-10113 have no concentration results (numbers), they are blank. Please provide these results.

- 2.      Response to LANL General Comment No. 2:** Although LANL provided a summary discussion of the risk assessment activities that have been performed for the Western Sanitary Waste Line, LANL did not provide the actual risk screening documentation (for residential and industrial exposures) which was requested. All previously submitted risk information was in a "piecemeal" fashion which did not explain and justify the assumptions and calculations provided. Please provide this information to NMED in an orderly format.
- 3.      Response to LANL General Comment No. 3:** NMED is comfortable using "large area" discrete sampling if there is not enough sample volume, such as inside the pipes; however, it is not acceptable to use "large area" discrete sampling for soil confirmation samples underneath the pipes.
- 4.      Response to LANL General Comment No. 4:** LANL mentions that they could not investigate 7 of the 13 required locations in the RFI Workplan because of the following physical problems/constraints: buildings and related structures; retaining walls; concrete drives and walks; buried utilities; plantings on private property; and lack of at least twenty feet of continuous access in both parallel and perpendicular directions. NMED's point is that LANL was aware or should have been aware of these problems when they developed the RFI workplan. When LANL was choosing the sampling locations to be included in the RFI workplan the above mentioned problems should have been identified.

LANL needs to ensure that they cannot sample the "missed" locations not only from the

trenching methods but also from drilling or other sampling methods. If the site cannot be accessed after an exhaustive search of sampling techniques, then LANL will need to meet with NMED to resolve this issue.

5. **Response to LANL General Comment No. 5:** The approved workplan requires that LANL provide geologic descriptions on each borehole. LANL should be following the approved workplan. Future LANL investigations should include a soil/geologic description of the entire length of the borehole.
6. **Response to LANL General Comment No. 6:** When investigating a SWMU, confirmatory soil samples must be lab analyzed. Field screening results alone cannot be used to NFA a SWMU. LANL must resample the soil underneath the pipeline where there were no lab analytical results. Please submit a sampling plan to address sampling underneath the pipeline at Locations 1A and 13.
7. **Response to LANL General Comment No. 7:** LANL's response is acceptable.

#### **Specific Comments**

1. **Response to LANL Response No. 1:** NMED will require additional sampling beneath the pipes at Location 1A. LANL must take two soil samples underneath the pipe and two soil samples beneath the broken vitrified clay pipe.
2. **Response to LANL Response No. 2:** NMED does not have a problem with compositing of the waste materials inside the pipe. NMED has a problem with the compositing of confirmatory soil samples underneath the pipes and will require resampling underneath the pipes.
3. **Response to LANL Response No. 3:** LANL's response is unacceptable. LANL should take confirmatory soil samples which are lab analyzed. Field screening results are unacceptable for confirmation samples.
4. **Response to LANL Response No. 4:** LANL's response is acceptable.
5. **Response to LANL Response No. 5:** LANL's response is acceptable.
6. **Response to LANL Response No. 6:** LANL's response is acceptable.
7. **Response to LANL Response No. 7:** The response given should be evaluated by NMED,

since it pertains to radiological field screening of boreholes.

- 8. Response to LANL Response No. 8:** LANL's response is acceptable.
- 9. Response to LANL Response No. 9:** LANL should be made aware that all future reports submitted to NMED must include all chemical results in the appropriate table, regardless of the concentration level.
- 10. Response to LANL Response No. 10:** The purpose of an RFI investigation is to determine the vertical and horizontal extent of contamination. Even though the contamination has been reduced by excavating the visually contaminated soil, the remaining soil is still above a screening levels. LANL's response is not acceptable. NMED will require deeper vertical sampling at Location 13, reference locations 47 and 50.